

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI**

VINCENT CANNADY	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2:19-CV-04001-BCW
	)	
STATE OF MISSOURI, et al.	)	
	)	
Defendants.	)	

**DEFENDANT'S MOTION TO DISMISS**

COMES NOW defendants State of Missouri, State of Missouri Administrative Hearing Commission, Willis Doss, Aaron Hart, and Brandon Ousley, pursuant to Fed. R. Civ. P. 12(b)(1) and (6), and for the reasons more fully developed in the suggestions filed in support of this motion, move to dismiss Plaintiff's Complaint with prejudice.

For the reasons stated in their Suggestions in Support of Motion to Dismiss, Defendants respectfully request that this Court enter an order sustaining this motion and dismissing Plaintiff's claims with prejudice.

Respectfully submitted,

**ERIC SCHMITT**  
Attorney General

/s/ Robert Hatley  
Robert Hatley, Mo. Bar No.: 67719  
Assistant Attorney General  
615 E. 13<sup>th</sup> Street, Suite 401  
Kansas City, Missouri 64106  
Phone: (816) 889-2250  
Facsimile: (816)889-5006  
[robert.hatley@ago.mo.gov](mailto:robert.hatley@ago.mo.gov)

Attorney for Defendants State of  
Missouri, State of Missouri  
Administrative Hearing Commission,  
Willis Doss, Aaron Hart, and Brandon  
Ousley

**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2019, I filed the foregoing electronically  
with the Clerk of Court and mailed a copy, postage prepaid, to:

Vincent Cannady  
17472 S. 2950 Road  
El Dorado Springs, Missouri 64744  
Pro se Plaintiff

/s/ Robert Hatley  
Assistant Attorney General